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Attorney for Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

UNITED STATES OF AMERICA,

CR 11-096 MO

Plaintiff,

**MOTION TO CONTINUE
TRIAL DATE**

v.

KAO FEY SAECHAO,

Defendant.

Defendant Kao Fey Saechao, through his attorney, Patrick J. Ehlers, moves this Court to continue the trial which is presently scheduled for Tuesday, September 6, 2011, for a period of approximately 60 days to Tuesday, November 8, 2011, or a date thereafter convenient to the Court. Additional time is requested to allow sufficient time to complete review of discovery, investigation, research, and consultation with Mr. Saechao regarding his case. This is Mr. Saechao's third request to continue the trial date. This motion is unopposed by Assistant United States Attorney Scott

Kerin.

This continuance constitutes excludable delay to November 8, 2011, pursuant to Title 18, United States Code, Section 3161(h)(7)(A). The ends of justice served by granting this motion outweigh the best interests of the public and Mr. Saechao in a speedy trial because the additional time is necessary to defense counsel sufficient time to complete discovery review, investigate the case, conduct research, consult with Mr. Saechao, and prepare his case. Mr. Saechao acknowledges his right to a speedy trial under the Speedy Trial Act and agrees that this motion will result in excludable delay under the Act.

RESPECTFULLY SUBMITTED this August 23, 2011.

/s/ Patrick Ehlers

Patrick J. Ehlers

Attorney for Defendant